

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JASON GOODMAN,

Plaintiff,

v.

CHRISTOPHER ELLIS BOUZY, et al.,

Defendants.

Case No. 1:21-cv-10878

**NOTICE OF DEFENDANTS BENJAMIN WITTES' AND NINA JANKOWICZ'S
MOTION FOR SANCTIONS AGAINST PLAINTIFF
UNDER FEDERAL RULE OF CIVIL PROCEDURE 11**

PLEASE TAKE NOTICE that upon the annexed declarations of Nina Jankowicz and Benjamin Wittes, dated March 2 and 6, 2023, respectively, the exhibits thereto, the accompanying Memorandum of Law, and proceedings heretofore had herein, Defendants Benjamin Wittes and Nina Jankowicz ("Movants") will move this Court, before the Honorable Analisa Torres, at the United States Courthouse located at 500 Pearl Street, New York, New York, 10007-1312, Courtroom 15D, at a date and time to be determined by the Court, for an Order, pursuant to Fed. R. Civ. P. 11(b) and this Court's inherent authority: (a) enjoining Plaintiff from filing in this District any additional documents on the docket for this case that relate to Mr. Wittes or Ms. Jankowicz; (b) enjoining Plaintiff from filing in any federal district court any action against Mr. Wittes or Ms. Jankowicz related to the subject matter of this case; (c) enjoining Plaintiff from filing any new *pro se* action against Mr. Wittes or Ms. Jankowicz in any federal district court without first obtaining leave of that court; and (d) ordering that Plaintiff pay the fees and costs Mr.

Wittes and Ms. Jankowicz incurred in defending against this action and litigating this sanctions motion.

Dated: April 3, 2023

Respectfully submitted,

/s/ Elizabeth C. Lockwood

Elizabeth C. Lockwood

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of April, 2023, I caused true and correct copies of the foregoing Notice of Motion to be served electronically via ECF on the following:

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I additionally certify that on the 3rd day of April, 2023, I caused true and correct copies of the foregoing Notice of Motion to be served via email and U.S. Mail First Class on the following:

Mr. Jason Goodman
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By: /s/ Elizabeth Lockwood